| Comment | Name of commenter | Contact | Summary of comment | Proposed response |
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| | | | b. the cost of the revisions exceeds 50% of building's assessed value, excluding the cost of compliance with this standard.<br>[1] The ISC adds the word "building" but should add the phrase "building or ventilation system." If only substantial alterations to the "building" are considered, floor-by-floor alterations may trigger a whole-building code upgrade (even for ventilation systems that are not addressed by the alterations), or may *not* trigger floor-by-floor ventilation system code upgrades (since the cost of ventilation system revisions is very likely to be less than 50% of the assessed value.<br>[2] Since "current code" may result in either a decrease or an increase in ventilation requirements, replace "brought up to" (which implies increasing requirements) with "brought into compliance with". | |
| 0009/002 | Dennis A. Stanke | | 4.1.2.5 **Change in Use.** If a space application category as listed in Table 2 changes, such as from office to retail, the ~~minimum~~ ventilation system serving the space(s) shall meet the requirements of ~~rates required by~~ section 6 ~~shall be met~~.<br><br>Since section 6 includes system ventilation requirements as well | ACCEPT IN PRINCIPLE<br><br>See rewording as suggested by commenter 0005/003 |

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| | | | ~~are not required to be brought into compliance except as required by Section 4.1.2.5. Exception: Replacement of a building component or individual piece of equipment with a component of like size and kind provided all requirements of codes effective at the time of original system design and installation are met. For example, replacement of an air conditioning unit with one of similar capacity would not require that the ventilation rate requirements and other requirements of this standard be met.~~<br><br>This has been incorporated into my proposed revisions to section 4.1.2.2 Repairs. | |
| 0009/001 | Dennis A. Stanke<br>The Trane Company<br>Ph: 608-787-3608<br>F: 608-787-3608<br>E: dstanke@trane.com | | 4.1.2.4 **Substantial Alterations.** If a building or ventilation system [1] is substantially altered, the requirements of section 4.1.1 shall be met as if the building or ventilation system were new. A building or ventilation system shall be considered substantially altered if:<br>a. the revision triggers a provision in the applicable prevailing building codes that requires that the building or ventilation system be brought ~~up~~ into compliance with [2] ~~to~~ the current code; or | ACCEPT IN PRINCIPLE<br><br>The commenter's concerns are already covered by section 4.1.2.3.<br><br>Change "up" to "into"<br><br>Reword to read:<br><br>" the revision requires that the building be brought into compliance with the current code; or..." |

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| | | | Society. The current standard and the proposed addendas need major revision in light of the societies new policies, the rules of which are yet to be defined. | |
| 0010/003 | Rodney H. Lewis, PE | | This section is way too complicated. Simplify.<br><br>This addenda does not in my opinion comply with the Colliver report or the petition which has been adopted by the Society. The current standard and the proposed addendas need major revision in light of the societies new policies, the rules of which are yet to be defined. | REJECT<br><br>This section contains the appropriate wording to convey its intended use. |

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| | | | as minimum space outdoor airflow and minimum space supply airflow values, "change in use" should result in recalculation of both space and system airflow values, not just space airflow values, as indicated by draft wording. | |
| 0010/001 | Rodney H. Lewis, PE<br>Rodney H. Lewis Assoc., Inc.<br>Ph: 713-975-0780<br>F: 713-975-1327<br>E: rodhlewis@earthlink.net | | 4.1.2.4 - This section is ambiguous and could be interpreted unreasonably by building officials. This addenda does not in my opinion comply with the Colliver report or the petition which has been adopted by the Society.<br><br>The current standard and the proposed addendas need major revision in light of the societies new policies, the rules of which are yet to be defined. | REJECT<br><br>The language is very clear and unambiguous. |
| 0010/002 | Rodney H. Lewis, PE | | 4.1.2.5b. – Delete and substitute: "4.1.2.5b: A significant change in occupancy, either in occupants or increase in contaminant sources." Language similar to the proposed addenda was omitted from the uniform building code because of the many definitions of costs.<br><br>This section is ambiguous and could be interpreted unreasonably by building officials. This addenda does not in my opinion comply with the Colliver report or the petition which has been adopted by the | REJECT<br><br>See suggested rewording which give the maximum flexibility to standard users. |

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**SUMMARY OF COMMENTS ON ADDENDUM 62K (Sept 9, 2000)**

| Comment | Name of commenter | Contact | Summary of comment | Proposed response |
|---|---|---|---|---|
| 0001/001 | Maury Wawryk<br>Venmar CES Inc.<br>Ph: 306-242-3663<br>F: 306-242-3484<br>E:mwawryk@venmarvent.com | | I agree with the changes listed in Addendum K. | ACCEPT. |
| 0002/001 | Todd Veiler<br>Venmar CES Inc.<br>Ph: 306-242-3663<br>F: 306-242-3484<br>E: tweiler@venmarvent.com | | SAME AS 0001/001 | ACCEPT. |
| 0003/001 | Luc Janelle<br>Venmar CES Inc.<br>Ph: 306-242-3663<br>F: 306-242-3484<br>E: ljanelle@venmarvent.com | | SAME AS 0001/001 | ACCEPT. |
| 0004/001 | Hal Levin<br>Building Ecology Research Gr<br>Ph: 831-425-3946<br>F: 831-426-6522<br>E: hlevin@cruzio.com | | 4.1.2.1 – Delete the period at the end of the section after the word "construction" and add the following: "and the ventilation provided to the added spaces must meet the requirements of this standard."<br><br>This clarifies the intent and leaves less for misinterpretation. | REJECT<br><br>The added verbiage proposed is in conflict with the exception. |
| 0004/002 | Hal Levin | | 4.1.2.3 – Add the words "replaces one that" after the words "a building that" in the first line and delete the words "and replaced" in the same line.<br><br>This clarifies the meaning and reduces the possibility of misinterpretation. | REJECT.<br><br>The wording "remove and replace" is an industry accepted term that means what the commenter is intending to clarify. |

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| 0005/001 | Marco Giamberardino<br>BOMA International<br>Ph: 202-326-6356<br>F: 202-371-0181<br>E:mgiamberardino@boma.org | | 4.1.2.3, Replacement – Rephrase beginning of second sentence to read "Unaltered components not being removed or replaced are not required to be brought into compliance…"<br><br>This provides needed clarity. | ACCEPT IN PRINCIPLE<br><br>Reword as follows:<br>"Unaltered components are not required to be brought into compliance…" |
| 0005/002 | Marco Giamberardino | | 4.1.2.4, Substantial Alterations – In b., replace "assessed value" with "replacement cost".<br><br>Replacement cost offers a more accurate measure. | ACCEPT IN PRINCIPLE.<br><br>Reword as follows:<br><br>" ...building's value..."<br><br>Leave it up to user to determine which building valuation system to use. |
| 0005/003 | Marco Giamberardino | | 4.1.2.5, Change in Use – Add "for that space" to the end of the sentence.<br><br>This provides needed specificity. | ACCEPT |
| 0006/001 | Gary Kuhl<br>Philip Morris Mgmt Corp.<br>Ph: 917-663-3467<br>F: 917-663-5849 | | 4.1.2.1. - Retain the language from the first public review draft and renumber following sections accordingly. Thus: **4.1.2.1 Retroactive Application.** Except as indicated in this section, the requirements of this standard shall not be retroactively applied to existing buildings.<br><br>As a major building owner and tenant in North America and around the world, Philip Morris is a regular user of ANSI/ASHRAE 62-1989 and will be impacted by virtually | REJECT<br><br>1. The proposed wording would prohibit application of this standard even under voluntary circumstances to existing buildings, which is not the committee's intent.<br>2. Certain proposed addendum will apply to existing buildings (e.g. 62l) |

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| | | | every aspect of any revision. Philip Morris objects to this proposed independent substantive change. It should be made clear that existing buildings need not comply with the standard. Costly retrofits could be required if ASHRAE does not explicitly address this issue. | |
| 0006/002 | Gary Kuhl | | 4.1.2.4 and 4.1.2.5 – Delete 4.1.2.4 and 4.1.2.5 and insert text from the first public review draft. Thus: **4.1.2.4 Substantial Alterations and Change in Use.** If the use of space changes substantially or if a space is substantially altered, the requirements of 4.1.1 shall be met. A space shall be considered substantially altered or its use substantially changed if so triggered by the applicable prevailing building code.<br><br>Philip Morris Management Corp. chose not to comment on Addendum 62k when it was released for its first public review, because we found text in the original, November 1998, draft more appropriate for an ASHRAE standard. The ISC language has become far too specific and is more suitable for a building code than for a standard. | ACCEPT IN PRINCIPLE<br><br>The ISC language is more flexible than the proposed wording and accomplishes the intent of the commenter. |
| 0007/001 | John Hogan<br>Seattle Dept. of Design, | | "4.1.2.4 – "Substantial Alterations... | ACCEPT IN PRINCIPLE |

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| Comment | Name of commenter | Contact | Summary of comment | Proposed response |
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| | Construction, and Land Use<br>Ph: 206-386-9145<br>F: 206-233-7883<br>E:john.hogan@ci.seattle.wa.us | | a. ...~~or~~<br>b. --- or<br>c. more than 50 percent of the ventilation system is replaced.<br><br>The ventilation system is the important element. There may be cases where the building code will trigger upgrading of the ventilation system. However, there may be cases when the ventilation system is substantially revised even when other components are not. In this case, even if there are no changes made to the building envelope or the lighting system, the ventilation system should comply. | The language in 4.1.2.3 covers the very issue raised by the commenter and the suggested changes are not necessary. |
| 0008/001 | Ed Fickes<br>Fickes Engineering<br>Ph: 972-423-0203<br>F: 972-423-7635<br>E: fickes@ix.netcom.com | | 4.1.1 – Delete 4.1.1 and replace with new language.<br>4.1.1 – ~~New Buildings. New, buildings falling within the scope of this standard shall comply with all sections 5 and 6 and all normative appendices apply to new buildings falling within the scope of this standard~~. New natural or mechanical ventilation systems in new buildings.<br><br>This is a ventilation standard for ventilation systems, not a building standard. Therefore, stating the standard applies to buildings is not correct. This proposed change makes more sense. | REJECT<br><br>This section uses the building type to determine applicability. Other proposed new sections in the standard do address non-ventilation components (e.g. protection of building materials from moisture) |
| 0008/002 | Ed Fickes | | 4.1.2 - Delete 4.1.2. | REJECT. |

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| | | | mechanical ventilation systems shall meet the requirements of section 4.1.1 without requiring the existing ventilation system to comply with all requirements of this standard.<br><br>The standard deals with ventilation systems in buildings, not buildings. My added language also covers the awkwardly expressed exception in a more concise manner. | |
| 0008/004 | Ed Fickes | | Modify 4.1.2.2 to read –<br>4.1.2.2 Repairs. Repairing (making operational) or replacing existing equipment or other system ~~building~~ components shall be allowed without requiring the existing ventilation system to comply with all requirements of this standard.<br><br>This is a ventilation standard, not a building standard, so building was deleted. The added language makes a clearer statement as to intent of standard as it applies to existing system components for repair or replacement. | REJECT<br><br>This section uses the building type to determine applicability. |
| 0008/005 | Ed Fickes | | 4.1.2.3 – Delete 4.1.2.3, relocate language meeting intent to Section 4.1.2.2 Repairs.<br>~~4.1.2.43 Replacement. Any component of a building that is removed and replaced shall meet the applicable requirements of Section 5 of this standard for that component. Unaltered elements~~ | REJECT<br><br>This section uses the building type to determine applicability. |

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| | | | ~~4.1.2 Existing Buildings.~~<br>~~4.1.2.1 Retroactive Application. Except as indicated in this section, the requirements of this standard need not be retroactively applied to existing buildings.~~<br><br>There are no words left in the proposal for this subsection and the comment working implies some type of compliance without doing anything. Therefore, this section should be removed. | Subsequent sections are clearly numbered. |
| 0008/003 | Ed Fickes | | 4.1.2.1 – Delete 4.1.2.1 and replace with new language.<br>4.1.2.~~2~~1 ~~Additions to Existing Buildings. All additions to existing buildings shall meet the requirements of section 4.1.1 as if the addition were a new building.~~<br>~~Exception: When an existing ventilation system is extended to serve an addition, the existing system components, such as fans and cooling and heating equipment, need not meet the requirements of this Standard. However, the extended existing system must remain in compliance with ventilation codes and standards that were in effect at the time it was permitted for construction.~~<br>4.1.2.~~2~~1 Additions to Existing Natural or Mechanical Ventilation Systems: All additions to existing natural or | REJECT<br><br>This section uses the building type to determine applicability. |

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